Linda D. Smith, SB#7438

LINDA D. SMITH, P.C.

74 E. 2700 S.

South Salt Lake, Utah 84115

Telephone: (801) 485-3717 Facsimile: (801) 485-3711

Attorney for Debtor, Shahin Mohammad Reza

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

IN RE:

SHAHIN MOHAMMAD REZA

Bankruptcy Case No.12-28944

Chapter 13

Judge R. Kimball Mosier

PRECONFIRMATION MOTION TO MODIFY CHAPTER 13 PLAN
AND TO CONFIRM SUCH WITHOUT NOTICE OR HEARING

Under 11 U.S.C. § 1323, the debtor hereby modifies the most-recently filed Chapter 13 plan and moves the court for confirmation of the plan as modified without further notice and hearing. In support thereof, the debtor represents as follows:

1. The most recently-filed plan is hereby modified as

follows:

Section	Previously-Filed Plan	Plan as modified on
	Provision	September 18, 2012
12	Debtor will pay Chase Home	Third party will pay
	Mortgage directly each	Chase Home Mortgage
	month.	directly each month.

2. The modification does not negatively impact secured, priority, or nonpriority unsecured creditors because [select one or both if applicable]: _X__ the modification only increases the monthly payment so that the plan pays all provided-for claims within 60 months; and/or _X_ the modification only increases the return to nonpriority unsecured claims to satisfy the requirements of § 1325.

3. Under § 1323(c), any holder of a secured claim that has accepted or rejected the prior plan is deemed to have accepted or rejected, as the case may be, the plan as modified unless the modification provides for a change in the rights of such holder from what such rights were under the plan before modification, and such holder changes such holder's precious acceptance or rejection.

THEREFORE, because the modification does not require notice to creditors, the debtor requests the court to confirm the plan as modified without further notice or hearing.

DATED this 19th day of September, 2012

Attorney for Debtor

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing paper was served electronically to all parties entitled to receive CM/ECF notice in this case.

Kevin R. Anderson ecf filing

All Creditors in the attached Matrix

Case 12-28944 Doc 24 Filed 09/19/12 Entered 09/19/12 10:41:38 Desc Main Document Page 4 of 4

Label Matrix for local noticing 1088-2 Case 12-28944 District of Utah Salt Lake City Wed Sep 19 10:12:59 MDT 2012

Faramarz Baravi Kami L Petersson
4412 south 500 east p.o box 30709
Salt Lake City, UT 84107-2866 S.L.C, UT 84130-0709

Shahin Mohammad Reza 5809 S. Waterbury Dr. Salt Lake City, UT 84121-1154

Chase

3415 Vision Drive

Columbus, OH 43219-6009

Linda D. Smith 74 E. 2700 So. South Salt Lake, UT 84115-3132 United States Trustee Ken Garff Bldg. 405 South Main Street Suite 300 Salt Lake City, UT 84111-3402

Kevin R. Anderson tr

405 South Main Street

Salt Lake City, UT 84111-3408

Suite 600

(p) ZIONS FIRST NATIONAL BANK LEGAL SERVICES UT ZB11 0877 P O BOX 30709 SALT LAKE CITY UT 84130-0709

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Zions Bank P.O box 30709 S.L.C, UT 84130

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) R. Kimball Mosier

End of Label Matrix
Mailable recipients 8
Bypassed recipients 1
Total 9